WORLDCOM.

April 10, 2003

REDACTED – FOR PUBLIC INSPECTION

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

>   *Re: In the Matter of Qwest Communications International, Inc. Application*
>   *for Authority to Provide In-Region, InterLATA Service in New Mexico,*
>   *Oregon, and South Dakota;* **WC Docket No. 03-11**

Dear Ms. Dortch:

WorldCom is filing today in the above-referenced proceeding both a confidential and redacted version of the attached *ex parte* letter. The confidential document is being submitted with an appropriate cover letter with the understanding that the confidential material will be fully protected by the Protective Order established specifically for this docket and that the requirements for review and use of the document will be fully satisfied.

Please call me at (202) 736-6468 with any questions.

Sincerely,

/s/
Lori E. Wright
Associate Counsel
Federal Advocacy

Enclosures

WORLDCOM℠

April 10, 2003

Lori Wright
Associate Counsel, WorldCom
1133 19th Street, N.W.
Washington, D.C. 20036

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

REDACTED FOR PUBLIC INSPECTION

Re: EX PARTE

In the Matter of Qwest Communications International, Inc. Application for Authority to Provide In-Region, InterLATA Service in New Mexico, Oregon, and South Dakota; WC Docket No. 03-11

Dear Ms. Dortch:

Qwest's defense of its OSS relies in part on the fact that WorldCom has been able to overcome some of the severe problems imposed by Qwest's OSS. We agree with Qwest that WorldCom has overcome some of these difficulties. For example, WorldCom has largely overcome the difficulties posed by Qwest's egregious documentation errors related to ordering of features. After WorldCom shut down its systems for two weeks and subsequently recoded its interfaces multiple times, it managed to reduce its overall reject rate from nearly 100% in January to 55.6% for the week ending April 4. It did this largely by recoding its systems as it became clear, based on the rejects, how Qwest's systems actually operated with respect to ordering features. In the week ending April 4, only 7.5% of WorldCom's rejects were related to feature activity.

But that should not excuse Qwest from its responsibility for the thousands of feature-activity rejects that WorldCom received as a result of Qwest's incomplete and flawed documentation and the non-standard format of Qwest's CSRs for multi-line accounts, which greatly harmed WorldCom's customers and forced WorldCom repeatedly to undertake costly recoding efforts. Qwest should not be free to impose severe costs on CLECs through inaccurate documentation and non-standard CSR formats

just because CLECs may eventually be able to overcome the barriers created by that documentation.[1]

Approximately 45% of the rejects WorldCom received the week of April 4 stem from a variety of different causes, many of which WorldCom at this point is unable to attribute to Qwest. The remaining half of the rejects relate to address errors − errors that would not exist if Qwest had implemented migrate by telephone number and street address number ("migrate by TN and SANO"). WorldCom estimates that approximately one-quarter of these rejects stem from the CALA issue. As WorldCom has explained, part of Qwest's documentation indicates that CALA codes are not needed if a zip code is required. The documentation defines CALA as the "Code used to identify what area an address is located in <u>when a zip code is unavailable</u>. EDI Disclosure Documentation 10.0 "EU-26a/CALA" (emphasis added). Based on this statement and the absence of any logical need for CALA codes, WorldCom concluded that it did not need to provide the CALA so long as it provided the zip code. WorldCom Reply Comments at 9. But it turns out CALA is required, as a separate part of the documentation indicated. WorldCom should not have to recode its interfaces to include these unnecessary codes. To do so would be quite burdensome because it would require adding a field for these codes to all of WorldCom's downstream systems. Unfortunately, implementation of migrate by telephone number and SANO will not eliminate this issue, because a full service address, including CALA, will still be required on supplemental and account maintenance orders.

With respect to the other three-fourths of the address rejects, it is possible that many of these transactions would not have rejected if WorldCom were pulling addresses from the PREMIS database instead of the CRIS database. WorldCom has previously explained why it built its systems to use addresses from CRIS. In any event, the continuing high level of address rejects demonstrates the dangers of OSS that depends on addresses, rather than permitting migration by TN and SANO. Indeed, while it may have been possible for WorldCom to have avoided many of its remaining rejects, the fact is that no CLEC has yet been able to overcome all of the complexities of Qwest's OSS and

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[1] For example, Qwest does not really deny that: (1) it failed to document the differences between placement of telephone numbers for single-line and multi-line customers, forcing WorldCom to shut down its systems for two weeks. Listing feature detail as "optional" does not document for CLECs that telephone numbers will be in different places on single-line and multi-line accounts; (2) it failed to document that CSRs for multi-line customers are out-of-sequence, leading to many thousands of rejects of WorldCom orders. The fact that one multi-line account that Qwest added to SATE in December, only one month before WorldCom was scheduled to launch service, included out-of-sequence features hardly provided WorldCom adequate notice of the out-of-sequence issue. All but one of the multi-line accounts in SATE had features that were in-sequence, in contrast to production where almost all multi-line accounts have features that are out-of-sequence; (3) it failed to document that some of its CSRs would have only 7-digit forward-to numbers even though its ordering requirements called for 10-digit numbers, leading to many rejects. The existence of an unimplemented change request concerning the recap function, a GUI function, is not an excuse for inaccurate documentation; (4) it failed to document accurately how blocking options should be ordered, leading to misprovisioning of blocking options for most customers with blocking; and (5) it provided WorldCom with incorrect information on use of customer codes, leading to many rejects on supplemental orders.

poor documentation and to develop OSS for high-volume ordering that includes feature changes and results in a low level of rejects.

Qwest points to one UNE-P CLEC ** ** and one resale CLEC ** ** that have developed EDI interfaces for migrate-as-specified orders and are placing more than a handful of orders with acceptable reject rates.[2] But these CLECs are not submitting orders at close to the volumes that a true mass market CLEC such as WorldCom would submit. And the reject rates Qwest provides for these CLECs are not based only on migrate-as-specified orders, as Qwest acknowledges in a footnote (Qwest April 8C *ex parte*, Att. A2, n.1), and as is apparent by comparing the order volumes in Attachments A1 and A2 in Qwest's April 8C *ex parte*. Moreover, WorldCom has learned from conversations with these CLECs that they hand-hold orders and conduct many manual checks on their side of the interfaces to ensure that the orders are perfectly coded and all errors on the Qwest CSR are eliminated before the orders are submitted. This is not possible for a high-volume CLEC like WorldCom. Further, ** ** told WorldCom that it took more than a year for it to build its EDI interface, and ** ** entered a secret deal with Qwest that may have provided it access to technical help that was unavailable to other CLECs. Finally, and most fundamentally, there is simply no evidence that these CLECs were able to develop their interfaces smoothly without substantial problems caused by Qwest's poor OSS documentation.

As the Commission is well aware, WorldCom believes that migrate by TN and SANO and industry-standard migrate-as-specified are critical before CLECs will be able to smoothly enter the Qwest market and subsequently expand their market share. Qwest finally implemented this functionality last weekend. But it is far too early to know whether these systems changes will work. And given Qwest's history of poor OSS development, there is reason to be skeptical. Indeed, the early signs are not good. In response to the issue raised by WorldCom concerning database mismatches, Qwest says that in most cases migrate by TN and SANO will not include SANO. Qwest has basically implemented migrate by TN alone. Qwest April 8C *ex parte* at 9. But this is likely to lead to significant problems. The original CR that WorldCom submitted asked for migrate by TN and name, not migrate by TN alone. The CR was framed this way for a reason. By comparing the TN on an order with the customer's name or the SANO[3] Qwest would be able to verify that the TN on the order is in fact the one the CLEC wants migrated. But in implementing migration by TN alone, Qwest risks migration of the wrong customer. If the CLEC has made a mistake in entering the telephone number on the order, the wrong customer will be migrated. That is why all other ILECs have implemented either migrate by TN and name or migrate by TN and SANO. Yet Qwest

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[2] Qwest also points to an AT&T test in Minnesota, but AT&T's reject rate spiked up in the last months of that test, suggesting something odd about the test results. *See* Qwest April 8C, 2003 ex parte letter. Moreover, during the last round of section 271 applications, AT&T explained that when it entered production, its experience with EDI ordering was so bad that it stopped submitting these orders. *See* AT&T Comments, In the Matter of Qwest Application for Authority to Provide In-Region InterLATA Services in Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington, and Wyoming, WC Docket No. 02-314, filed Oct 15, 2002, at 60.

[3] Qwest said that name and TN would be difficult, so WorldCom agreed to name and SANO.

chose to ignore what the Z-Tel CR specifically requested and to implement new functionality that may cause problems worse than the ones it cures.

WorldCom therefore believes that the Commission should reject this application and then monitor whether Qwest's systems changes are working. This would not only ensure that these critical changes are working, but would also provide Qwest additional time to clean up other important issues that remain.

Indeed, on April 8 and 9, Qwest announced three new systems defects. First, Qwest announced that "CLECs may receive LSR rejects when requesting PICs or LPICs that are valid for the area." *See* attached Event Notification PCRM Ticket Number 6199861. In other words, when WorldCom requests that its customers receive WorldCom long distance service, the orders may reject. Qwest has proposed no fix for this problem, saying only that for now CLECs could request manual handling on the orders and enter the PIC in the remarks field. But this would lead to a vast decrease in order flow through because CLECs, such as WorldCom, request PIC changes on a significant number of their orders. Second, Qwest announced that "CLECs may receive LSR rejects when deleting USOC ESX on a residential account." *See* attached Event Notification PCRM Ticket Number 6198464. Again Qwest proposed no fix date but instead suggested CLECs request manual handling on the orders. Finally, Qwest announced that "CLECs are not receiving end user TNs related to service order activity (OC&C data) for UNE-P accounts produced in the BOS record format" – data needed to audit bills. Qwest provided no fix date for this problem either and did not even provide a manual work-around.

In addition, Qwest has not yet implemented an acceptable means of provisioning blocking. As WorldCom has previously explained, Qwest did not accurately inform CLECs how to order blocking options, and, as a result, customers often received blocking options they did not order. Qwest does not deny this, but says that in March it documented how CLECs should order blocking – once again ignoring the harm it caused to CLECs by its prior failure. More important on a going-forward basis, the process Qwest has documented will again require recoding by CLECs, and will also result in manual processing of the many orders involving blocking – delaying the high percentage of CLEC orders that involve blocking and likely resulting in additional provisioning errors. Qwest says that a pending CR will address the concern with manual processing in Release 14.0. But there is no justification for forcing CLECs to wait many months for resolution of a major problem Qwest has just created. Moreover, the existing change request for industry-standard migrate-as-specified, which Qwest implemented last weekend, should have eliminated all feature problems such as the one that exists with blocking. Apparently, however, Qwest decided on its own that this CR did not apply to blocking.

Qwest still does not have in place an acceptable process for placing supplemental orders before a CSR has been updated. The process that Qwest referred to during the course of prior section 271 applications did not work, as WorldCom found when it began submitting supplemental orders. Qwest responds that the only reason the process did not

work is because of the way WorldCom coded its EDI. That is wrong. The original process did not work because Qwest rejected orders submitted using the process. Qwest then suggested an extremely complex alternative process. Use of such a process would require WorldCom to in effect submit the original LSR again, include a different Purchase Order Number, mark the LSR for manual handling, and populate on the order the order number that Qwest returned on the original Firm Order Confirmation or Service Order Completion. Qwest says some CLECs are using this process. Qwest provides no data on their success in doing so, but, in any event, the process is not usable for a high volume CLEC like WorldCom. WorldCom could not track orders effectively and preclude errors if it submitted a second LSR that was effectively the same as the first.

Qwest also has not yet provided an acceptable way for CLECs to obtain customer codes generally needed on supplemental orders.[4] Qwest now claims that CLECs can obtain customer codes from the bill posting process, although it previously told WorldCom to the contrary. Qwest also previously told WorldCom that the customer code from the FOC or SOC would work and this turned out not to be so. The last thing WorldCom wants to do is to recode its interfaces again – based on what is likely to be poor documentation – only to find the recoding produces no benefit. And customer codes are needed on almost all account maintenance orders, because Qwest generally maintains multiple CSRs for at least 30 days after a CLEC has submitted an initial order.

Finally, Qwest continues to have ongoing problems with the records it transmits on the Daily Usage Feed. Although Qwest dismisses the DUF issues raised by WorldCom, outside the context of this proceeding it has acknowledged many of these issues are valid. It has sent the following notifications (attached hereto) to the CLEC community regarding issues raised by WorldCom:

1. 6195261: Receiving incorrect feature codes DUF records;
2. 6193072: Receiving incorrectly formatted long duration records;
3. 6195278: Receiving "I CALLED" special feature records on both 100118 and 100119 category records.

All of these issues are causing a hardship to WorldCom since we must create special codes in each region of the Qwest territory so that we can correctly bill our customers. In some instances we will not be able to bill our customers for particular usage at all due to these errors.

The fact is that Qwest's OSS remains in the early stages of development. WorldCom has begun surmounting some of the difficulties caused by this OSS. But WorldCom should not have been forced to spend months recoding its interfaces as a result of Qwest documentation errors so that it could reduce its reject rate from near 100% to 56%. And Qwest systems issues continue to plague WorldCom. The Commission should reject this application and require Qwest to try again when its latest

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[4] The customer codes are necessary whenever Qwest is maintaining multiple CSRs – which it generally does for 30-90 days after an initial order is submitted.

fixes have had time to work and when it has implemented corrections for the additional OSS problems that exist

Sincerely,
/s/
Lori Wright
Associate Counsel

cc: R. Harsch
       H. Best
       D. Booth
       K. Cremer
       A. Medeiros
       R. Weist
       P. Bonrud